

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

RAMONA THURMAN BIVINS,	)	
	)	
Plaintiff,	)	
	)	CIVIL ACTION NO.:
vs.	)	1:22-cv-04149-WMR
	)	
FELICIA FRANKLIN, in her individual	)	<b>JURY TRIAL DEMANDED</b>
and official capacities;	)	
ALIEKA ANDERSON, in her individual	)	
and official capacities;	)	
GAIL HAMBRICK, in her individual	)	
and official capacities; and	)	
CLAYTON COUNTY, GEORGIA,	)	
	)	
	)	
Defendants.	)	

**PLAINTIFF’S CONSENT MOTION FOR AN EXTENSION OF TIME TO  
RESPOND TO DEFENDANT ALIEKA ANDERSON’S  
MOTION FOR JUDGMENT ON THE PLEADINGS**

COMES NOW, Plaintiff Ramona Thurman Bivins (“Ms. Bivins”), and moves this Court for an Order extending the time period for her response to the Motion for Judgment on the Pleadings filed by Defendant Alieka Anderson, in her individual and official capacities (“Defendant Anderson”) [ECF No. 29], through and including January 12, 2023, showing the Court as follows:

1. On October 17, 2022, Plaintiff filed her Complaint for Damages and Injunctive Relief against Defendants Felicia Franklin (“Franklin”), in her individual

and official capacities, Alieka Anderson (“Anderson”), in her individual and official capacities, Gail Hambrick (“Hambrick”), in her individual and official capacities, and Clayton County, Georgia. [ECF. 1].

2. On November 22, 2022, Defendant Anderson filed her Answer to Plaintiff’s Complaint. [ECF No. 19].

3. On December 5, 2022, Defendants Hambrick and Clayton County filed their Motion to Dismiss Plaintiff’s Complaint. [ECF No. 22].

4. Upon motion on December 5, 2022, by Defendants Hambrick and Clayton County to stay all discovery [ECF No. 23], the Court entered an Order [ECF No. 24] on December 5, 2022, staying all discovery in this matter pending the final resolution of Defendants’ Motion to Dismiss.

5. On December 12, 2022, Defendant Franklin filed her Answer to Plaintiff’s Complaint. [ECF No. 25].

6. On December 22, 2022, Defendant Anderson filed her Motion for Judgment on the Pleadings and Brief in Support Thereof. [ECF No. 29].

7. Plaintiff’s response to Defendant Anderson’s Motion for Judgment on the Pleadings is currently due on January 5, 2023.

8. In light of the recent holidays and numerous court deadlines in other matters, Plaintiff respectfully requests a seven (7) day extension of time to file her

response to the Motion for Judgment on the Pleadings filed by Defendant Anderson through and including January 12, 2023.

9. Counsel for Plaintiff conferred with counsel for Defendant Anderson regarding the relief sought in this motion, and Counsel for Defendant Anderson consents to this motion.

10. The requested extension will not prejudice any party and is sought in good faith and not for the purposes of delay or any other purpose contrary to the Federal Rules of Civil Procedure and the Local Rules of this Court.

WHEREFORE, Plaintiff respectfully requests the Court grant her Motion for an Extension of Time to Respond to Defendant for Judgment on the Pleadings [ECF No. 29], extending the deadline to January 12, 2023.

A proposed order is attached herewith.

Respectfully submitted this 4th day of January, 2023.

**BUCKLEY BEAL LLP**

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and official capacities; and	)	
CLAYTON COUNTY, GEORGIA,	)	
	)	
	)	
Defendants.	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on January 4, 2023, I electronically filed the above **PLAINTIFF’S CONSENT MOTION FOR AN EXTENSION OF TIME TO RESPOND TO DEFENDANT ALIEKA ANDERSON’S MOTION FOR JUDGMENT ON THE PLEADINGS** with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

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